



To the Honorable H.A.W.Skeen, Judge of the Circuit Court
for Lee County, Virginia:

Humbly complaining your orator, Eli King, would respectfully show to your Honor that some twenty years ago he intermarried with one Eleander _____. At the time of said marriage your orator as well as the said Eleander _____ was a citizen and resident of Lee County Virginia, where he in his said wife continued to reside together as man and wife until something like six or eight years ago when his wife, the said Eleander, for some reason unknown to him became quarrelsome, dissatisfied and jealous, and acted in such a manner as to make herself and your orator both unhappy and miserable, and finally, about six or eight years ago abandoned and deserted your orator, since which time they have not lived together as man and wife nor have they cohabited.

Your orator further states and will show your honor, that he was to his said wife a faithful, industrious and true husband all the time they lived together and provided for her a good living, and that he would have continued so to do had she remained with him and permitted him. That during the time they lived together, her father conveyed to them jointly a twenty-five acre tract of land, and that your orator purchased and paid for something like 100 or 125 acres of land. That upon the tract conveyed to them by the father of his said wife he made permanent and valuable improvements, such as repairing house, building out-houses, barn and setting out orchard, until its value was very materially increased. That when his said wife left and abandoned your orator, she took with her a horse, a cow and all the household and kitchen furniture.

Your orator would state and charge that the 25 acres conveyed to him and his said wife jointly, and the personal property she carried away with at the time she abandoned your orator would be as much or more than she would be entitled to had he died and she be left a widow, or as much or more than she would be entitled to, the value of his property and financial standing considered, but he is willing for her to have the same title to be made accordingly whenever his divorce is granted him, he retaining absolute title to the land and property con-

veyed solely to him, free from the contingent right of dower of his said wife.

Your orator will further state that he and his said wife are, and have been residents of Lee County Virginia all their lives. That his said wife abandoned him more than three years before the institution of this suit, and he verily believes that she is fully determined never to live with him again.

Now the object of this bill is to procure a dissolution of the bonds of matrimony now existing between him and the said Eleander King, and to equitably adjust property rights between them, and to this end he prays that the Eleander King be made ~~one~~ a party hereto and answer the same, but not under oath that being expressly waived, and for all other further and general relief. And he will ever pray &c.

D. C. Seiwell.
Attyl for plaintiff.

Eli King
vs $\frac{1}{2}$ Bill for Dime

Alexander King

1900, 1st September Rules
Bill filed & paid & accepted

" 2nd Sept rules Cause
Set for hearing by
Plaintiff

Eli King Plff

against
Eleanor King Defd } In chg -

This cause came on this day to be heard upon the Bill of the Plaintiff, the depositions of witnesses & was argued by counsel.

On consideration whereof it appearing that process has been duly & properly served in this cause & the depositions showing a case of abandonment & desertion of the Plaintiff by the Defendant it is therefore adjudged, ordered & decreed that the bonds of matrimony contracted & entered into and hitherto existing between the Plaintiff, Eli King, and the Defendant, Eleanor King be & the same are hereby dissolved and annulled. And it appearing proper the Plaintiff will make & deliver a deed to the Defendant conveying his interest in & to the 25 acre tract conveyed to the Plaintiff & defendant jointly.

by the father of the Defendant,
and the Defendant will release
all her right of dower in & to
the other lands of the Plaintiff,
and the Plaintiff recover his
cost for which execution may
issue & this Cause is
stricken from the docket -

Eli King

vs) Deceitful

Eleanor King

Entered on P. 12/2.6
P. 449.

Enter this

It is now
Nov 13-1900—

90 to 00

L

The depositions of James Moles, J.A. Whisman and others, taken before me _____ a notary public for the County of Lee in the State of Virginia, at the law office of D.C. Sewell, in the town of Jonesville, on this the 30th day of October, 1900, pursuant to a notice hereto attached, which are to read as evidence in behalf of the plaintiff in a certain suit in chancery pending in the Circuit Court of Lee County Virginia, wherein Eli King is plaintiff and Eleande King is defendant.

Present Eli King and D.C. Sewell attorney for same, and,
G.G. King representing Mrs. Eleander King
J.A. Whisman a witness of lawful age being duly sworn deposes as

follows:

Q.1.-- Please state you age, occupation and place of residence.

A.-- I am 47 years old, I am a farmer, and live in Lee County Virginia

Q.2.-- Are you acquainted with the parties to this suit, and if so how close do you live to them?

A.-- I am acquainted with both of them, have known them all my life. I live about one-fourth of a mile of Mr. King and about one mile from where Mrs. King now lives.

Q.3.-- Do they now live together as man and wife?

A.-- They do not.

Q.4.-- How long have they been separated and been living a part?

A.-- About five years. She told me yesterday that they^{this} had been apart five years in ~~xxxx~~ October.

Q.5.-- Do you know anything about the circumstances of their separation?

A.-- I do not. I only know they separated.

~~Q.6.--~~

And further this deponent saith not.

J. A. Whisman

James Moles another witness of lawful age being duly sworn deposes as follows:

vQ.1.-- Please state your age, place of residence and occupation.

A.-- I am 34 years old, I live in Lee County Virginia, and am a famrer.

Q.2.-- Do you know the parties to this suit, and how long have you known them?

A.-- I do know them, have known them ever since I was about eight years old.

Q.3.-- Do they live together as man and wife?

A.-- They do not live together. They have been apart five years the 14th of this month.

Q.4.-- Do you know anything of the circumstances of their separation?

A.-- I understood that she became jealous, and I have heard them fusses some, but just who was to blame I don't know. I have heard her quarrel considerably at him, but I never heard him say very much to her.

Q.5.-- Where do these parties reside?

A.-- They reside in Lee County Virginia, and have so resided ever since I have known them.

~~XX~~

~~XXXX~~

Q.6.-- ~~XXXXXX~~ Can you state whether or not she left the home where they resided, and abandoned him, or he left the home where they resided and abandoned her?

A.-- She left the home where they resided and abandoned him, and they have never since lived together as man and wife.

And further this deponent saith not.

his
James X. Molar
more

Eli King another witness of lawful age being duly sworn deposes as follows:

Q.1.-- Are you the plaintiff in this case?

A.-- I am.

Q.2.-- State whether or not your wife, Eleander King, deserted and abandoned you and your home, and if so how long has it been?

A.-- She did abandon me about five years ago, since which time we have not lived together as man and wife, and we have not cohabited together.

And further this deponent saith not.

his
Eli X. King
more

Virginia Lee County to-wit:

I, C.E.Couk, a notary public for the County of Lee in the State of Virginia, do certify that the foregoing depositions of J.A.Whisman, James Moles and Eli King were taken sworn to and subscribed before me in my county aforesaid, and for the purpose and at the time and place in the caption mentioned. Given under my hand this the 30th day of October, 1900.

C.E.Couk N.P.

Eli King
vs. { Depositions
Gander King

Received from C. E. Cook
the N. P. before whom
taken and filed October
30th 1900.

A. B. Munsey Clerk

Notary fee 1 hr. \$.75

Printed by Eli

To Mrs Eleanor King

Take notice that I shall, on the 30th day of October 18900,
at Law office of D. P. Sewell in Juriesville Va
between the hours of 8 A. M. and 6 P. M., on that day, proceed to take the depositions
of Jones Moles and others, to be read in evidence in my behalf,
in a certain Suit in chancery depending in the Appx court for the
County of Lee wherein you are Defendant
and I am Plaintiff; and if, from any cause, the taking of the said depositions
be not commenced on that day, or, if commenced, be not concluded on that day, the taking of the
same will be adjourned and continued from day to day, or from time to time, at the same place and
between the same hours, until the same shall be completed.

Respectfully yours,

Eli King
by Counsel

Eli King

vs. }

NOTICE TO TAKE
DEPOSITIONS.

Alexander King
Notice to take &

D. P. Swine p. q.

Executed Oct
29th in the morning at 10 o'clock
by delivering
a true copy of the
within notice to
Alexander King

J. A. Missogran
C. L. County

The Commonwealth of Virginia,

To the Sheriff of the County of Lee, Greeting:

WE COMMAND YOU, That you summon Eleanor King

to appear at the Clerk's office of the Circuit Court of the County of Lee, at the rules to be held
for the said court, on the 1st Monday in September 1900, to answer a
bill in chancery exhibited against her in our said court by Eli King

And have then there this writ. Witness, A. B. MUNSEY, Clerk of our said Court, at the
court-house, the 8th day of August 1900 ~~189~~, and in the 25th year of the
Commonwealth.

A. B. Munsey Clerk

Eli King

vs. {

SUBPOENA
IN CHANCERY

Eleanor King

D. C. Sewell p. q.

To 15th September Rules.

Sevent Court.

Executed August
the 16th 1900 by
Delivering a tested
affidavit copy of the
within California in
Chancery to Eleanor
King W. J. Mulholland
L.C.